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August 23, 2022

VIA ECF

The Honorable Denise L. Cote
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Granted,
Denise Cote
8/24/22

RE: In re LATAM Airlines Group S.A., et al., Case No 22-cv-05660 and Case No. 22-cv-5891

Dear Judge Cote:

The undersigned counsel represent the undersigned Intervenor-Appellees and the Debtors (as defined below) in the above captioned appeals. On August 17, 2022, your honor entered an order that allocated the time that each party may use during oral argument, which is scheduled for August 26, 2022, allocating an aggregate 5 minutes to the Intervenor-Appellees in each appeal. To facilitate the orderly presentation of argument to the Court, counsel for the Intervenor-Appellees have conferred and coordinated with counsel for LATAM Airlines Group, S.A. and its affiliated debtors (the "Debtors") (together with the Intervenor-Appellees, the "Appellees"). After such consultation, the Appellees respectfully request that the Court reallocate the time allocated to the Appellees for oral argument in each of the appeals as set forth in the tables below.

Case No. 22-cv-05660 (Ad Hoc Group of Unsecured Claimants v. LATAM Airlines Group S.A., et al.)

Appellee to Present at Oral Argument	Current Time Allotment	Requested Time Allotment
The Debtors	10 minutes	13 minutes
Intervenor-Appellees	5 minutes	2 minutes
<i>Total Time for Appellees</i>	15 minutes	15 minutes

August 23, 2022

Case No. 22-cv-5891 (TLA Claimholders Group v. LATAM Airlines Group S.A., et. al.)

Appellee to Present at Oral Argument	Current Time Allotment	Requested Time Allotment
The Debtors	10 minutes	12 minutes
Intervenor-Appellees	5 minutes	3 minutes
<i>Total Time for Appellees</i>	15 minutes	15 minutes

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The Appellees notified the applicable appellants in each appeal regarding this request. The Ad Hoc Group of Unsecured Claimants has informed the Appellees that it does not oppose the requested reallocation of time. The TLA Claimholders Group informed the Appellees that it takes no position concerning the requested reallocation of time.

As reflected above, the Appellees do not seek an enlargement of the total time currently allocated to the Appellees at oral argument. The Appellees respectfully submit that the proposed reallocation of oral argument time will streamline the presentation of issues at oral argument, minimize duplication, and facilitate the Court's consideration and resolution of the appeal. Notwithstanding this requested reallocation of oral argument time, all Appellees will be prepared to speak to any issue that the Court wishes the Appellees to address.

For the foregoing reasons, the Appellees respectfully request that the Court reallocate the time allotted to Appellees as reflected in the chart above.

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August 23, 2022



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